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Exempt from Filing Fees Pursuant to Government Code § 6103

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Attorney for Plaintiff

ABDUL GHAZNAWI

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ABDUL GHAZNAWI,

CASE NO. 2:22-cv-01988-MCE-CSK

Plaintiff,

**JOINT STIPULATION AND ORDER TO
CONTINUE SCHEDULING DEADLINES**

v.

Complaint Filed: 11/02/22

SAN JOAQUIN COUNTY AND SHERIFF
DEPUTIES DOES 1-50,

Defendants.

1 Plaintiff ABDUL GHAZNAWI (“Plaintiff”) and Defendant SAN JOAQUIN COUNTY
2 (“Defendant”) (collectively, “Parties”), by and through their respective counsel of record, hereby
3 stipulate and request that the Court issue an Order to further extend the case management deadlines set
4 by this Court in an Order entered on January 3, 2024 (ECF No. 19), and partially modified in a
5 subsequent Order dated April 26, 2024 (ECF No. 30).

6 WHEREAS, pursuant to the Court’s Order, ECF No. 19, the deadline to file dispositive motions
7 is currently November 21, 2024.

8 WHEREAS, pursuant to the Court’s Order, ECF No. 30, fact discovery is to be completed by
9 June 21, 2024; expert disclosures are to take place by July 26, 2024; and rebuttal expert disclosures are
10 to take place by August 26, 2024.

11 WHEREAS, Defendant will need to complete the deposition of Plaintiff. Plaintiff’s counsel has
12 provided three dates of availability for Plaintiff in June, and has advised that Plaintiff is only available
13 on Friday’s due to his work schedule. Accordingly, Defendant has noticed Plaintiff’s deposition for
14 June 21, 2024, the date of the fact discovery deadline. Of the three dates provided, this is the only date
15 that worked for defense counsel’s calendar.

16 WHEREAS, Plaintiff would like to depose three officers allegedly involved in the events giving
17 rise to Plaintiff’s operative Complaint.

18 WHEREAS, defense counsel Carl Fessenden is scheduled to be on a pre-paid vacation from June
19 7 – 21, 2024. Defense counsel Suli Mastorakos will no longer be counsel of record on this case as of
20 June 20, 2024.

21 WHEREAS, in light of Plaintiff’s deposition falling on the date of the fact discovery deadline,
22 Plaintiff’s request to depose three officers, and defense counsel’s unavailability and changes to the
23 handling attorneys for the defense, due to the looming June 21, 2024 fact discovery deadline, the parties
24 believe extending the fact discovery deadline by an additional five weeks to complete depositions is
25 appropriate.

26 WHEREAS, the Court has not yet set a trial date in this matter.

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WHEREAS, counsel for both Plaintiff and Defendant have agreed to modify the deadlines in this matter, as follows:

Event	Current Deadline	Proposed Deadline
Fact Discovery Cut-off	June 21, 2024	July 29, 2024
Expert Disclosures	July 26, 2024	September 2, 2024
Rebuttal Expert Disclosures	August 26, 2024	October 3, 2024
Dispositive Motion Filing Deadline	November 21, 2024	December 30, 2024

WHEREAS, the parties submit that good cause exists for this extension. The requested extension will facilitate the exchange of further information concerning the case, and will provide the parties sufficient time to prepare their respective cases.

IT IS SO STIPULATED.

Dated: June 12, 2024

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By /s/Suli A. Mastorakos
Carl L. Fessenden
Suli A. Mastorakos
Attorneys for Defendant

Dated: June 12, 2024

LAW OFFICE OF STANLEY GOFF

By /s/Stanley Goff (Authorized 6/4/24)
Stanley Goff
Attorney for Plaintiff

ORDER

GOOD CAUSE APPEARING, the parties' stipulation is GRANTED. The following deadlines are CONTINUED and RESET as follows:

Event	Current Deadline	Proposed Deadline
Fact Discovery Cut-off	June 21, 2024	July 29, 2024
Expert Disclosures	July 26, 2024	September 2, 2024
Rebuttal Expert Disclosures	August 26, 2024	October 3, 2024
Dispositive Motion Filing Deadline	November 21, 2024	December 30, 2024

IT IS SO ORDERED.

Dated: June 12, 2024


MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE